IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

MACON COUNTY INVESTMENTS, INC.; REACH ONE, TEACH ONE OF AMERICA, INC.,	)
Plaintiffs,	)
v.	)**Civil Action No.: 3:06-cv-224-WKW**
SHERIFF DAVID WARREN, in his official capacity as the SHERIFF OF MACON COUNTY, ALABAMA,	)
Defendant.	)

PLAINTIFFS' APPLICATION FOR DEFAULT JUDGMENT

COME NOW the Plaintiffs, Macon County Investments, Inc., ("MCI") and Reach One, Teach One of America, Inc., ("Reach One, Teach One") pursuant to Rule 55 of the Federal Rules of Civil Procedure ("FRCP") and hereby file this Application for Default Judgment against the Defendant. The Plaintiffs' also incorporate by reference and adopt as if fully set forth herein their arguments and submissions made in the Plaintiff's Motion to Strike. As grounds for this Application, the Plaintiffs state the following:

1. The Defendant was duly served via certified mail with the Plaintiff's Complaint for Declaratory and Injunctive Relief on March 11, 2006.

2. The 20-day time period for a response as given by Rule 12(a), FRCP, has passed.

3. The Defendant has failed to answer or otherwise defend as to the Plaintiff's Complaint, or serve a copy of any answer or other defense which he might have upon the undersigned attorney of record within the requisite time period.

4. As such, an entry of a default judgment against the Defendant pursuant to Rule 55, FRCP, is warranted due to his failure to defend.

5. Further, the Plaintiffs' request for injunctive relief should be granted.

6. Further still, this Court should issue a declaration the Original Rules governing the operation of a Bingo facility in Macon County should apply, and the First and Second Amended Rules are null and void.

WHEREFORE, PREMISES CONSIDERED, the Plaintiffs respectfully request that this Court enter a default judgment against the Defendant and grant the relief requested by the Plaintiff's in their Complaint.

Respectfully Submitted,

/s/ Ramadanah M. Salaam
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon all counsel of record via this Court's electronic filing system on this the 3rd day of April, 2006.

/s/ Ramadanah M. Salaam
OF COUNSEL